

REMARKS

This Application has been carefully reviewed in light of the Final Office Action dated October 15, 2009 ("*Office Action*"). At the time of the *Office Action*, Claims 1, 7-21, 23, 29-43, 45, 51-65, 67, 73-87, and 90-106 were pending and stand rejected. Applicants amend Claims 1, 23, 45, 67, and 90-91. As described below, Applicants believe all claims to be allowable over the cited references. Therefore, Applicants respectfully request reconsideration and full allowance of all pending claims.

I. Section 103 Rejections

The Examiner continues to reject Claims 1, 7-13, 23, 29-35, 45, 51-57, 67, 73-79, and 90-99 under 35 U.S.C. § 103(a) as being unpatentable over *Aronberg* in view of *Lin*. The Examiner continues to reject Claims 14-15, 17-19, 36-37, 39-41, 58-59, 61-63, 80-81, 83-85, 100, 101, and 103-104 under 35 U.S.C. § 103(a) as being unpatentable over *Aronberg* in view of *Lin* and further in view of *Lubanski*. The Examiner continues to reject Claims 20, 42, 64, 86, and 105 under 35 U.S.C. § 103(a) as being unpatentable over *Aronberg* in view of *Lin* and further in view of *Brovick*. The Examiner continues to reject Claims 16, 21, 38, 43, 60, 65, 82, 87, 102, and 106 under 35 U.S.C. § 103(a) as being unpatentable over *Aronberg* in view of *Lin* and further in view of *Davis*. Applicants respectfully traverse these rejections.

A. Claims 1, 7-21, 23, 29-43, 45, 51-65, 67, 73-87, and 90, 92-106

As stated above, independent Claims 1, 23, 45, 67, and 90 are rejected over the proposed *Aronberg-Lin* combination. Applicants respectfully traverse these rejections. Amended Claim 1 of the present Application recites:

A method for managing a plurality of computers, at least one of the plurality of computers associated with a user having a user characteristic, comprising:

displaying, to a network administrator, a user-object data structure comprising resource information identifying a plurality of network computers in an enterprise system that are used by a selected one of a plurality of users, the plurality of enterprise computers representing all of the network computers in the enterprise system that are used by the selected user;

receiving selection information from the network administrator, the selection information comprising a user characteristic associated with the selected user;

receiving management information from the network administrator;

identifying, as target computers to receive a modification, all of the plurality of that are used by the selected user;

selecting each of the target computers that are used by the selected user based on the selection information;

comparing the management information to existing scheduled policies to determine if one or more conflicts exist;

allowing the network administrator to modify the management information to resolve the one or more conflicts, if the one or more conflicts exist; and

modifying each of the target computers that are used by the selected user based on the management information after the one or more conflicts are resolved.

Applicants respectfully submit that the proposed *Aronberg-Lin* combination does not disclose, teach, or suggest the features and operations recited in at least Applicants' independent Claim 1.

For example, Applicants contend that the cited references, even when considered in combination, do not disclose, teach, or suggest the following claim elements:

- comparing the management information to existing scheduled policies to determine if one or more conflicts exist;
- allowing the network administrator to modify the management information to resolve the one or more conflicts, if the one or more conflicts exist; and
- modifying each of the target computers that are used by the selected user based on the management information after the one or more conflicts are resolved

Although *Aronberg* relates to "a system for distributing software in a customized configuration, to pre-selected computers in a network environment" and includes a workstation running a console for "[creating] distribution control information which dictates how the software is distributed and to what agent based workstations under a given set of conditions" (*Aronberg*, Abstract), the condition expression builder of *Aronberg* is client based rather than user based. Specifically, *Aronberg* discloses that "a condition expression builder . . . controls which computer should install the software" and that such conditions "may be based on the name of the computer running the agent, a group membership of the

computer running the agent, or hard disk capacity **of the computer** running the agent.” (*Aronberg*, Column 3, lines 8-14). Because the system of *Aronberg* is computer-centric rather than user-centric, *Aronberg* does not disclose, teach, or suggest “displaying, to a network administrator, a user-object data structure comprising resource information identifying a plurality of network computers in an enterprise system that are used by a selected one of a plurality of users, the plurality of enterprise computers representing all of the network computers in the enterprise system that are used by the selected user,” as recited in Claim 1.

Additionally, the Office Action relies on the “distribution control information” of *Aronberg* as disclosing the claimed “management information.” (*Office Action*, pg. 3). Even under this proposed interpretation (which Applicants do not necessarily agree with), *Aronberg* fails to disclose, teach, or suggest comparing the management information to existing scheduled policies to determine if one or more conflicts exist, much less allowing the network administrator to modify the management information to resolve the one or more conflicts if they exist. The additional disclosure of *Lin* does not cure these identified deficiencies of *Aronberg*.

For at least these reasons, the recited claim elements are allowable over the proposed *Aronberg-Lin* combination. Applicants respectfully request reconsideration and allowance of amended independent Claim 1, together with Claims 7-21 that depend on Claim 1. For analogous reasons, Applicants request reconsideration and allowance of amended independent Claims 23, 45, 67, and 90, together with Claims 29-43, 51-65, 73-87, and 92-106 that depend on Claims 23, 45, and 67, respectively.

B. Claim 91

Applicants respectfully submit that the proposed *Aronberg-Lin* combination does not disclose, teach, or suggest each and every element recited in Applicants’ Claim 91.

For example, as discussed above, the proposed *Aronberg-Lin* combination does not disclose, teach, or suggest “comparing the management information to existing scheduled policies to determine if one or more conflicts exist; allowing the network administrator to modify the management information to resolve the one or more conflicts, if the one or more conflicts exist; and modifying each of the target computers that are used by the selected user based on the management information after the one or more conflicts are resolved.

Furthermore, the proposed *Aronberg-Lin* combination does not disclose, teach, or suggest that the “selecting and modifying are performed when the user becomes newly associated with at least one of the target computers,” as recited in Claim 91. The *Office Action* admits that *Aronberg* fails to disclose “selecting and modifying are performed when the user becomes newly associated with at least one of the plurality of computers.” (*Office Action*, page 13). Instead, the *Office Action* relies on *Lin* as disclosing this limitation. (*Office Action*, page 13). Applicants respectfully disagree.

For instance, the cited portion of *Lin* discloses that “processing begins in client-side synchronization agent 7 when a new user logs on to local computer 3.” (*Lin*, column 4, lines 44-46). If the user is logged in and authorization is verified, user preferences may be implemented in local computer 3.” (*Lin*, column 4, lines 60-66) (emphasis added). However, after these preferences are implemented in the single local computer, the synchronization agent “may idle until the current user logs off of local computer 3.” (*Lin*, column 5, lines 10-15). It is not until after this log off that user preferences may be implemented in any other computers associated with the user. (See *Lin*, column 5, lines 15-31). Therefore, *Lin* fails to disclose, teach, or suggest “modifying each of the plurality of network computers associated with the single user . . . wherein selecting and modifying are performed when the user becomes newly associated with at least one of the target computers.” For at least these reasons, Applicants respectfully request reconsideration and allowance of independent Claim 91.

CONCLUSION

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully request full allowance of all pending claims.

Filing concurrently herewith is a Request for Continued Examination (RCE) Transmittal with the fee. Applicant believes that no other fee is due. However, the Examiner is hereby authorized to charge any fee additional fee or credit any overpayment to Deposit Account No. 02-0384 of BAKER BOTTS L.L.P.

If the Examiner feels that a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Luke K. Pedersen, Attorney for Applicants, at the Examiner's convenience at (214) 953-6655.

Respectfully submitted,
BAKER BOTTS L.L.P.
Attorneys for Applicants



Luke K. Pedersen
Reg. No. 45,003

Date: 1-8-10

Correspondence Address:

at Customer No.

05073